

THE HONORABLE Samuel J. Steiner
Chapter 11
Location: Seattle
Date of Hearing: 7 August, 2009
Time: 9:30 a.m.
Response Date: 31 July, 2009

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

IN RE:

**Carolyn Frame
and Charles Frame,**

Debtor.

IN CHAPTER 11 NO.:09-15727

**MOTION FOR ORDER TO USE POST-
PETITION EARNINGS AND CASH
COLLATERAL FOR THE PURPOSE
OF CONTINUING BUSINESS
ACTIVITIES**

COMES NOW the debtor, **Carolyn Frame and Charles Frame**, by and through
their attorney, DAVID CARL HILL, and moves this court for an Order granting them leave
to **USE POST-PETITION COLLATERAL FOR THE PURPOSE OF CONTINUING
BUSINESS ACTIVITIES AND PERSONAL ACTIVITIES.**

This Motion is made based upon the affidavit of DAVID CARL HILL, attached
hereto and incorporated herein by this reference.

/s/David Carl Hill
DAVID CARL HILL, WSB#9560
Attorney for Debtors

STATE OF WASHINGTON)
COUNTY OF KITSAP) ss.

1 DAVID CARL HILL, being first duly sworn on oath, deposes and states:

2 That I am the attorney for the debtor above named. Debtor requires the ability to pay
3 personal monthly expenses, and to continue business operations. Debtors monthly
4 anticipated income and expenses are set forth in Amended Schedules I and J. Copies of
5 these schedules are attached hereto as exhibits.

6 Debtors own or in partnership with several real estate Limited Liability Companies.
7 The projected income set forth in Schedule I represents the average sums collected by them
8 from the operation of these companies. The proposed expenses are set forth in Schedule J.
9 These Schedules represent their necessary living expenses.

10 Based upon the foregoing, I respectfully request that the debtors be granted leave
11 to use collateral to pay ongoing business expenses and continue paying living expenses.

12 Respectfully submitted.

13

14 /s/David Carl Hill
15 DAVID CARL HILL

16 SUBSCRIBED AND SWORN to before me this 16 day of July, 2009

17 /s/Kevin M. Decker
18 NOTARY PUBLIC in and for the
19 State of Washington.
20 My commission expires: April 1, 2012

21

22

23

24

25

26

27

28